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AMERICAN ELECTRONICS, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF ORANGE

ORANGE COUNTY WATER DISTRICT,

Plaintiff,

v.

NORTHROP CORPORATION;  
NORTHROP GRUMMAN  
CORPORATION; AMERICAN  
ELECTRONICS, INC.; MAG  
AEROSPACE INDUSTRIES, INC.;  
GULTON INDUSTRIES, INC.; MARK IV  
INDUSTRIES, INC.; EDO  
CORPORATION; AEROJET-GENERAL  
CORPORATION; MOORE BUSINESS  
FORMS, INC.; AC PRODUCT, INC.;  
FULLERTON MANUFACTURING  
COMPANY; FULLERTON BUSINESS  
PARK LLC; and DOES 1 through 400,  
inclusive,

Defendants.

CASE NO. 04CC00715

**DEFENDANT AMERICAN  
ELECTRONICS, INC.'S RESPONSE TO  
PLAINTIFF'S FIRST SET OF SPECIAL  
INTERROGATORIES**

PROPOUNDING PARTY : Plaintiff ORANGE COUNTY WATER DISTRICT  
RESPONDING PARTY : Defendant AMERICAN ELECTRONICS, INC.  
SET NO. : One

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AMERICAN ELECTRONICS' RESPONSES TO PLAINTIFFS' FIRST SET OF SPECIAL INTERROGATORIES

1                                    **PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

2            Defendant AMERICAN ELECTRONICS, INC. ("AMERICAN ELECTRONICS")  
3 hereby responds to Plaintiff ORANGE COUNTY WATER DISTRICT's ("OCWD") First Set of  
4 Special Interrogatories ("Interrogatories"). Each of the following objections is incorporated by  
5 reference into each response set forth below.

- 6            1. AMERICAN ELECTRONICS provides these responses in accordance with what  
7 AMERICAN ELECTRONICS understands and/or recalls as of the date of these  
8 responses. AMERICAN ELECTRONICS' investigation of the facts and law related to  
9 this case continues and AMERICAN ELECTRONICS has not completed its discovery or  
10 preparation for trial. While AMERICAN ELECTRONICS' responses to each of these  
11 Interrogatories is based on a reasonable and diligent investigation and search for the  
12 information requested, further discovery and analysis may reveal additional information,  
13 add meaning to known facts, and establish additional conclusions. Therefore, these  
14 responses are provided without prejudice to AMERICAN ELECTRONICS' right to add  
15 to, modify, or otherwise change or amend these responses. By providing these responses  
16 and objections at this time, AMERICAN ELECTRONICS does not intend to prejudice or  
17 waive any of AMERICAN ELECTRONICS' rights to utilize subsequently discovered  
18 information, other forms of evidence of facts yet to be discovered, or information that was  
19 unintentionally omitted.
- 20            2. AMERICAN ELECTRONICS objects to these Interrogatories insofar as they call for  
21 information in the possession, custody, and control of public agencies as this information  
22 is as readily available to OCWD as it is to AMERICAN ELECTRONICS.
- 23            3. AMERICAN ELECTRONICS objects to these Interrogatories to the extent that they seek  
24 information that has already been provided to, is already in the possession, custody, or  
25 control of, or is otherwise readily available to OCWD and are thus duplicative,  
26 unnecessary, burdensome, and harassing.
- 27            4. AMERICAN ELECTRONICS objects to each definition and Interrogatory to the extent  
28 that it seeks information that is neither relevant to the subject matter of the action nor

1 reasonably calculated to lead to the discovery of admissible evidence.

2 b. Accordingly, AMERICAN ELECTRONICS objects to each and every  
3 Interrogatory insofar as OCWD fails to limit the scope of the Interrogatory  
4 to property located at 1600 E. Valencia Drive in Fullerton, California.

5 5. AMERICAN ELECTRONICS further objects to each Interrogatory on the grounds that it  
6 is overbroad, burdensome, and oppressive due to OCWD's failure to limit the  
7 Interrogatories in time and/or to the period of AMERICAN ELECTRONICS' occupancy  
8 of 1600 E. Valencia Drive in Fullerton, California.

9 6. AMERICAN ELECTRONICS objects to each definition and Interrogatory to the extent  
10 that it seeks information protected by the attorney-client privilege, the work-product  
11 doctrine, and/or any other applicable privilege or confidentiality protection. Any  
12 inadvertent disclosure of any privileged or protected information shall neither constitute a  
13 waiver of any privilege nor a waiver of any rights AMERICAN ELECTRONICS may  
14 have to object to the use of any of the information in any subsequent proceedings or at  
15 trial.

16 a. Accordingly, AMERICAN ELECTRONICS objects to OCWD's definition  
17 of "YOU," which includes AMERICAN ELECTRONICS' attorneys and  
18 consultants on the grounds that OCWD seeks information protected from  
19 disclosure by the attorney-client privilege, the work-product doctrine,  
20 and/or any other applicable privilege or confidentiality protection.

21 7. AMERICAN ELECTRONICS objects to each Interrogatory to the extent that it seeks to  
22 discover sensitive, confidential, proprietary, and/or commercial information, the discovery  
23 of which could be damaging to the business or property of AMERICAN ELECTRONICS  
24 and which is protected by constitutional, statutory, or common law rights of privacy.

25 8. AMERICAN ELECTRONICS objects to these Interrogatories to the extent that they  
26 request information that is not within its possession, custody, or control and are thus  
27 overly broad and burdensome.  
28

1 a. Accordingly, AMERICAN ELECTRONICS objects to each and every  
2 Interrogatory insofar as it requests information related to property located at 1600  
3 E. Valencia Drive in Anaheim, California. AMERICAN ELECTRONICS neither  
4 owned nor conducted operations at property located in Anaheim, California.  
5 AMERICAN ELECTRONICS will interpret each such Interrogatory as requesting  
6 information regarding property located at 1600 E. Valencia Drive in Fullerton,  
7 California.

8 b. AMERICAN ELECTRONICS objects to each and every Interrogatory  
9 insofar as OCWD fails to limit the scope of the Interrogatory to activities, if any,  
10 conducted by AMERICAN ELECTRONICS.

11 9. AMERICAN ELECTRONICS objects to these Interrogatories on the grounds that OCWD  
12 has exceeded the number of specially prepared interrogatories allowed under California  
13 Code of Civil Procedure section 2030.030 and its Declaration for Additional Discovery  
14 incorrectly represents that the total number of Interrogatories being served by OCWD is  
15 (fifty-two) 52 when it is actually sixty-two (62) total Interrogatories.

16 **INTERROGATORY RESPONSES**

17 **SPECIAL INTERROGATORY NO. 1:**

18 State YOUR name as it appears in YOUR current articles of incorporation. ("YOU" or  
19 "AMERICAN ELECTRONICS" refers to defendant American Electronics, Inc., its employees,  
20 agents, attorneys, consultants, and anyone else acting on its behalf.)

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

22 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
23 Preliminary Statement and General Objections, which are incorporated by this reference as  
24 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
25 provides the following response: "American Electronics, Inc." is the name that appears on the  
26 Certificate of Amendment to Articles of Incorporation of American Electronics, Inc., filed with  
27 the California Secretary of State's office on June 21, 1996.  
28

1 **SPECIAL INTERROGATORY NO. 2:**

2 State all other names YOU used since 1960.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

4 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
5 Preliminary Statement and General Objections, which are incorporated by this reference as  
6 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
7 provides the following response: AMERICAN ELECTRONICS has used the names American  
8 Pacesetter, Inc. and American Electronics, Inc.

9 **SPECIAL INTERROGATORY NO. 3:**

10 At any time in the past, did YOU own the property located at 1600 E. Valencia Drive,  
11 Anaheim, California?

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

13 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
14 Preliminary Statement and General Objections, which are incorporated by this reference as  
15 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
16 provides the following response: Yes, AMERICAN ELECTRONICS owned property located at  
17 1600 E. Valencia Drive in Fullerton, California.

18 **SPECIAL INTERROGATORY NO. 4:**

19 If YOU owned the property located at 1600 E. Valencia Drive, Anaheim, California, list  
20 the dates of YOUR ownership.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

22 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
23 Preliminary Statement and General Objections, which are incorporated by this reference as  
24 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
25 provides the following response: AMERICAN ELECTRONICS owned property located at 1600  
26 E. Valencia Drive in Fullerton, California, from approximately April 9, 1979, to June 8, 1998.

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1 **SPECIAL INTERROGATORY NO. 5:**

2 At any time in the past, did YOU lease the property located at 1600 E. Valencia Drive,  
3 Anaheim, California Anaheim, California?

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

5 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
6 Preliminary Statement and General Objections, which are incorporated by this reference as  
7 though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory on the  
8 grounds that it is vague and ambiguous as to whether AMERICAN ELECTRONICS was the  
9 lessee or lessor of property located at 1600 E. Valencia Drive in Fullerton, California. Subject to  
10 the foregoing objections, AMERICAN ELECTRONICS provides the following response:

11 AMERICAN ELECTRONICS leased, as lessee, property located at 1600 E. Valencia Drive in  
12 Fullerton, California. AMERICAN ELECTRONICS leased, as lessor, property located at 1600  
13 E. Valencia Drive in Fullerton, California, to Wilson's Art Studio, Inc. and National Technical  
14 Systems.

15 **SPECIAL INTERROGATORY NO. 6:**

16 If YOU leased the property located at 1600 E. Valencia Drive, Anaheim, California list  
17 the dates of YOUR tenancy.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

19 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
20 Preliminary Statement and General Objections, which are incorporated by this reference as  
21 though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory on the  
22 grounds that it is vague and ambiguous as to whether AMERICAN ELECTRONICS was the  
23 lessee or lessor of 1600 E. Valencia Drive. Subject to the foregoing objections, AMERICAN  
24 ELECTRONICS provides the following response: AMERICAN ELECTRONICS leased, as  
25 lessee, property located at 1600 E. Valencia Drive in Fullerton, California, from approximately  
26 October 7, 1969, through April 8, 1979.

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1 **SPECIAL INTERROGATORY NO. 7:**

2 At any time in the past, did YOU occupy the property located at 1600 E. Valencia Drive,  
3 Anaheim, California Anaheim, California?

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

5 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
6 Preliminary Statement and General Objections, which are incorporated by this reference as  
7 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
8 provides the following response: Yes, AMERICAN ELECTRONICS occupied property located  
9 at 1600 E. Valencia Drive in Fullerton, California.

10 **SPECIAL INTERROGATORY NO. 8:**

11 If YOU occupied the property located at 1600 E. Valencia Drive, Anaheim, California list  
12 the dates of YOUR tenancy.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

14 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
15 Preliminary Statement and General Objections, which are incorporated by this reference as  
16 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
17 provides the following response: AMERICAN ELECTRONICS occupied property located at  
18 1600 E. Valencia Drive in Fullerton, California, between approximately October 7, 1969, and  
19 June 8, 1998.

20 **SPECIAL INTERROGATORY NO. 9:**

21 IDENTIFY each product that YOU used to degrease metal at 1600 E. Valencia Drive,  
22 Anaheim, California?

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

24 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
25 Preliminary Statement and General Objections, which are incorporated by this reference as  
26 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
27 provides the following response: AMERICAN ELECTRONICS is presently unaware of the  
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1 products it used to degrease metal at property located at 1600 E. Valencia Drive in Fullerton,  
2 California. Discovery is continuing and AMERICAN ELECTRONICS reserves the right to  
3 supplement its response to this Interrogatory as information becomes available.

4 **SPECIAL INTERROGATORY NO. 10:**

5 IDENTIFY each product that YOU used to clean metal at 1600 E. Valencia Drive,  
6 Anaheim, California?

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

8 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
9 Preliminary Statement and General Objections, which are incorporated by this reference as  
10 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
11 provides the following response: AMERICAN ELECTRONICS is presently unaware of the  
12 products it used to clean metal at property located at 1600 E. Valencia Drive in Fullerton,  
13 California. Discovery is continuing and AMERICAN ELECTRONICS reserves the right to  
14 supplement its response to this Interrogatory as information becomes available.

15 **SPECIAL INTERROGATORY NO. 11:**

16 Describe in detail YOUR use of any dip tanks at 1600 E. Valencia Drive, Anaheim,  
17 California.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

19 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
20 Preliminary Statement and General Objections, which are incorporated by this reference as  
21 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
22 provides the following response: AMERICAN ELECTRONICS is informed and believes that it  
23 may have utilized dip tanks in either its precision power or electro-mechanical instruments  
24 divisions. Metal parts were placed in metal dip cages, lowered into the dip tanks, and then  
25 removed from the dip tanks. Discovery is continuing and AMERICAN ELECTRONICS reserves  
26 the right to supplement its response to this Interrogatory as information becomes available.  
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1 **SPECIAL INTERROGATORY NO. 12:**

2 What activities did YOU engage in that used trichloroethylene (TCE)? ("TCE" means  
3 trichloroethene.)

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

5 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
6 Preliminary Statement and General Objections, which are incorporated by this reference as  
7 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
8 provides the following response: AMERICAN ELECTRONICS is informed and believes that it  
9 may have used TCE in its operations at property located at 1600 E. Valencia Drive in Fullerton,  
10 California, but is presently unaware of the activities in which it engaged that used TCE.  
11 Discovery is continuing and AMERICAN ELECTRONICS reserves the right to supplement its  
12 response to this Interrogatory as information becomes available.

13 **SPECIAL INTERROGATORY NO. 13:**

14 What activities did YOU engage in that used tetrachloroethene (PCE, a.k.a.  
15 perchloroethene)?

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

17 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
18 Preliminary Statement and General Objections, which are incorporated by this reference as  
19 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
20 provides the following response: AMERICAN ELECTRONICS is informed and believes that it  
21 may have used PCE in its operations at property located at 1600 E. Valencia Drive in Fullerton,  
22 California, but is presently unaware of the activities in which it engaged that used PCE.  
23 Discovery is continuing and AMERICAN ELECTRONICS reserves the right to supplement its  
24 response to this Interrogatory as information becomes available.

25 **SPECIAL INTERROGATORY NO. 14:**

26 Describe all activities in the chemical storage area at 1600 E. Valencia Drive, Anaheim,  
27 California during YOUR occupancy, which generated waste.

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

2 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
3 Preliminary Statement and General Objections, which are incorporated by this reference as  
4 though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory insofar  
5 as it implies or assumes that AMERICAN ELECTRONICS conducted activities at its chemical  
6 storage area at property located at 1600 E. Valencia Drive in Fullerton, California, that generated  
7 waste. Subject to the foregoing objections, AMERICAN ELECTRONICS provides the following  
8 response: AMERICAN ELECTRONICS is presently unaware of any activities conducted in the  
9 chemical storage area at property located at 1600 E. Valencia Drive in Fullerton, California, that  
10 generated waste. Discovery is continuing and AMERICAN ELECTRONICS reserves the right to  
11 supplement its response to this Interrogatory as information becomes available.

12 **SPECIAL INTERROGATORY NO. 15:**

13 Describe in detail YOUR use of any disposal pits at 1600 E. Valencia Drive, Anaheim,  
14 California.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

16 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
17 Preliminary Statement and General Objections, which are incorporated by this reference as  
18 though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory insofar  
19 as it implies or assumes that AMERICAN ELECTRONICS used disposal pits at property located  
20 at 1600 E. Valencia Drive in Fullerton, California. Subject to the foregoing objections,  
21 AMERICAN ELECTRONICS provides the following response: AMERICAN ELECTRONICS is  
22 presently informed and believes that it did not use any disposal pits at property located at 1600 E.  
23 Valencia Drive in Fullerton, California. Discovery is continuing and AMERICAN  
24 ELECTRONICS reserves the right to supplement its response to this Interrogatory as information  
25 becomes available.

26 **SPECIAL INTERROGATORY NO. 16:**

27 Describe all activities at 1600 E. Valencia Avenue Drive, Anaheim, California which  
28

1 generated SOLVENT waste.

2 **RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

3 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
4 Preliminary Statement and General Objections, which are incorporated by this reference as  
5 though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory insofar  
6 as it implies or assumes that AMERICAN ELECTRONICS conducted activities at property  
7 located at 1600 E. Valencia Drive in Fullerton, California, that generated solvent waste. Subject  
8 to the foregoing objections, AMERICAN ELECTRONICS provides the following response:  
9 AMERICAN ELECTRONICS is informed and believes that it may have utilized dip tanks in  
10 either its precision power or electro-mechanical instruments divisions, but is presently unaware of  
11 whether these operations generated solvent waste. Discovery is continuing and AMERICAN  
12 ELECTRONICS reserves the right to supplement its response to this Interrogatory as information  
13 becomes available.

14 **SPECIAL INTERROGATORY NO. 17:**

15 Did YOU dispose of any chemical waste at 1600 E. Valencia Drive, Anaheim, California?

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

17 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
18 Preliminary Statement and General Objections, which are incorporated by this reference as  
19 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
20 provides the following response: No, AMERICAN ELECTRONICS did not dispose of chemical  
21 waste at property located at 1600 E. Valencia Drive in Fullerton, California.

22 **SPECIAL INTERROGATORY NO. 18:**

23 Did YOU store any chemical waste at 1600 E. Valencia Drive, Anaheim, California?

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

25 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
26 Preliminary Statement and General Objections, which are incorporated by this reference as  
27 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
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1 provides the following response: Yes, AMERICAN ELECTRONICS stored chemical waste at  
2 property located at 1600 E. Valencia Drive in Fullerton, California.

3 **SPECIAL INTERROGATORY NO. 19:**

4 Did YOU use SOLVENTS at 1600 E. Valencia Drive, Anaheim, California?

5 (SOLVENTS means any product which contains one or more of the following chemicals,  
6 trichloroethene (TCE), tetrachloroethene (a.k.a. perchloroethylene) (PCE), 1,1 -dichloroethene  
7 (1,1-DCE), 1,2-dichloroethane (1,2-DCA), 1,4-dioxane (1,4D), 1,1,1 -trichloroethane (1,1,1-  
8 TCA), 1,1,2-trichloroethane (1,1,2-TCA), 1,2,3-trichloropropane (TCP), 1,1 -dichloroethane  
9 (1,1-DCA), methylene chloride, trans-1, 2,-dichloroethene (trans-1, 2-DCE) and cis-1, 2-  
10 dichloroethene (cis- 1,2-DCE).)

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

12 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
13 Preliminary Statement and General Objections, which are incorporated by this reference as  
14 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
15 provides the following response: AMERICAN ELECTRONICS is informed and believes that it  
16 may have used TCE, PCE, and 1,1,1-TCA at property located at 1600 E. Valencia Drive in  
17 Fullerton, California. Discovery is continuing and AMERICAN ELECTRONICS reserves the  
18 right to supplement its response to this Interrogatory as information becomes available.

19 **SPECIAL INTERROGATORY NO. 20:**

20 What SOLVENTS did YOU use at 1600 E. Valencia Drive, Anaheim, California?

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 20:**

22 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
23 Preliminary Statement and General Objections, which are incorporated by this reference as  
24 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
25 provides the following response: AMERICAN ELECTRONICS is informed and believes that it  
26 may have used TCE, PCE, and 1,1,1-TCA at property located at 1600 E. Valencia Drive in  
27 Fullerton, California. Discovery is continuing and AMERICAN ELECTRONICS reserves the  
28

1 right to supplement its response to this Interrogatory as information becomes available.

2 **SPECIAL INTERROGATORY NO. 21:**

3 Did YOU store any waste containing SOLVENTS at 1600 E. Valencia Drive, Anaheim,  
4 California?

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

6 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
7 Preliminary Statement and General Objections, which are incorporated by this reference as  
8 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
9 provides the following response: AMERICAN ELECTRONICS is informed and believes that it  
10 may have stored wastes containing PCE and/or TCE at property located at 1600 E. Valencia  
11 Drive in Fullerton, California. Discovery is continuing and AMERICAN ELECTRONICS  
12 reserves the right to supplement its response to this Interrogatory as information becomes  
13 available.

14 **SPECIAL INTERROGATORY NO. 22:**

15 Did you use STORAGE TANKS for SOLVENT at 1600 E. Valencia Drive, Anaheim,  
16 California during your occupancy? (STORAGE TANKS refers to above-ground or underground  
17 storage tanks.)

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

19 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
20 Preliminary Statement and General Objections, which are incorporated by this reference as  
21 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
22 provides the following response: No, AMERICAN ELECTRONICS did not use storage tanks to  
23 store solvents at property located at 1600 E. Valencia Drive in Fullerton, California.

24 **SPECIAL INTERROGATORY NO. 23:**

25 Did YOU dispose of any waste containing SOLVENTS at 1600 E. Valencia Drive,  
26 Anaheim, California?

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

2 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
3 Preliminary Statement and General Objections, which are incorporated by this reference as  
4 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
5 provides the following response: No, AMERICAN ELECTRONICS did not dispose of any waste  
6 containing solvents at property located at 1600 E. Valencia Drive in Fullerton, California.

7 **SPECIAL INTERROGATORY NO. 24:**

8 DESCRIBE all RELEASES of SOLVENTS at 1600 E. Valencia Drive, Anaheim,  
9 California which occurred during your occupancy. ("RELEASES" means any spilling, leaking,  
10 pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or  
11 disposing into the environment, including the abandonment or discarding of barrels, containers  
12 and other closed receptacles containing SOLVENTS. To "DESCRIBE" a release means to  
13 identify the date of the release(s), cause of the release and quantity released.)

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

15 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
16 Preliminary Statement and General Objections, which are incorporated by this reference as  
17 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
18 provides the following response: AMERICAN ELECTRONICS is presently unaware of any  
19 releases of solvents that occurred during AMERICAN ELECTRONICS' occupancy of property  
20 located at 1600 E. Valencia Drive in Fullerton, California. Discovery is continuing and  
21 AMERICAN ELECTRONICS reserves the right to supplement its response to this Interrogatory  
22 as information becomes available.

23 **SPECIAL INTERROGATORY NO. 25:**

24 DESCRIBE all RELEASES of SOLVENTS at 1600 E. Valencia Drive, Anaheim,  
25 California which occurred before YOUR occupancy.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

27 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
28

1 Preliminary Statement and General Objections, which are incorporated by this reference as  
2 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
3 provides the following response: AMERICAN ELECTRONICS is presently unaware of any  
4 releases of solvents that occurred before AMERICAN ELECTRONICS' occupancy of property  
5 located at 1600 E. Valencia Drive in Fullerton, California. Discovery is continuing and  
6 AMERICAN ELECTRONICS reserves the right to supplement its response to this Interrogatory  
7 as information becomes available.

8 **SPECIAL INTERROGATORY NO. 26:**

9 DESCRIBE all RELEASES of SOLVENTS at 1600 E. Valencia Drive, Anaheim,  
10 California which occurred after YOUR occupancy.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 26:**

12 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
13 Preliminary Statement and General Objections, which are incorporated by this reference as  
14 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
15 provides the following response: AMERICAN ELECTRONICS is presently unaware of any  
16 releases of solvents that occurred after AMERICAN ELECTRONICS' occupancy of property  
17 located at 1600 E. Valencia Drive in Fullerton, California. Discovery is continuing and  
18 AMERICAN ELECTRONICS reserves the right to supplement its response to this Interrogatory  
19 as information becomes available.

20 **SPECIAL INTERROGATORY NO. 27:**

21 DESCRIBE all RELEASES of chemical waste at 1600 E. Valencia Drive, Anaheim,  
22 California?

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 27:**

24 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
25 Preliminary Statement and General Objections, which are incorporated by this reference as  
26 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
27 provides the following response: AMERICAN ELECTRONICS is presently unaware of any  
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1 releases of chemical waste at property located at 1600 E. Valencia Drive in Fullerton, California.  
2 Discovery is continuing and AMERICAN ELECTRONICS reserves the right to supplement its  
3 response to this Interrogatory as information becomes available.

4 **SPECIAL INTERROGATORY NO. 28:**

5 To YOUR knowledge, has SOLVENT been detected in any soil sample taken at 1600 E.  
6 Valencia Drive, Anaheim, California?

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 28:**

8 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
9 Preliminary Statement and General Objections, which are incorporated by this reference as  
10 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
11 provides the following response: PCE and TCE have been detected in soil samples taken at  
12 property located at 1600 E. Valencia Drive in Fullerton, California, by AMERICAN  
13 ELECTRONICS in response to the October 26, 1998 request from the California Regional Water  
14 Quality Control Board, Santa Ana Region, ("Regional Board") that AMERICAN  
15 ELECTRONICS conduct a subsurface investigation. Neither PCE nor TCE were detected in soil  
16 samples taken at and below 100 feet below ground surface. Small concentrations (less than  
17 10µg/kg) of 1,1,1-TCA and 1,2-DCA were detected during the 1991 Phase II Subsurface  
18 Investigation conducted by Applied Geosciences Inc. on behalf of AMERICAN ELECTRONICS.  
19 As a result of the discovery of PCE and TCE contamination at the property, AMERICAN  
20 ELECTRONICS engaged in remediation efforts, which culminated in the issuance of two no  
21 further action letters, dated April 19, 1996, and June 20, 1996, from the California Regional  
22 Water Quality Control Board, Santa Ana Region, as well as a no further action letter from the  
23 Orange County Health Care Agency dated September 26, 1991.

24 **SPECIAL INTERROGATORY NO. 29:**

25 When did YOU learn of detections of SOLVENTS in soil at 1600 E. Valencia Drive,  
26 Anaheim, California?  
27  
28

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 29:**

2 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
3 Preliminary Statement and General Objections, which are incorporated by this reference as  
4 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
5 provides the following response: In approximately June 1989, AMERICAN ELECTRONICS  
6 learned that PCE and TCE were detected in soil samples taken from property located at 1600 E.  
7 Valencia Drive in Fullerton, California, as a result of the Subsurface Investigation conducted by  
8 Ray E. Lewis Engineering, Inc., a consultant retained by AMERICAN ELECTRONICS in  
9 response to an October 26, 1988 request from the California Regional Water Quality Control  
10 Board, Santa Ana Region. In approximately August 1991, AMERICAN ELECTRONICS learned  
11 that small concentrations (less than 10µg/kg) of 1,1,1-TCA and 1,2-DCA were detected in soil  
12 samples taken from the property located at 1600 E. Valencia Drive in Fullerton, California,  
13 during the 1991 Phase II Subsurface Investigation conducted by Applied Geosciences Inc. on  
14 behalf of AMERICAN ELECTRONICS. Discovery is continuing and AMERICAN  
15 ELECTRONICS reserves the right to supplement its response to this Interrogatory as information  
16 becomes available.

17 **SPECIAL INTERROGATORY NO. 30:**

18 To YOUR knowledge, has SOLVENT been detected in any soil-vapor sample at 1600 E.  
19 Valencia Drive, Anaheim; California?

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 30:**

21 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
22 Preliminary Statement and General Objections, which are incorporated by this reference as  
23 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
24 provides the following response: PCE, TCE, 1,1,1-TCA, 1,1-DCE have been detected in soil-  
25 vapor samples taken at property located at 1600 E. Valencia Drive in Fullerton, California, from  
26 depths of approximately eight (8) feet below ground surface to 20 feet below ground surface by  
27 AMERICAN ELECTRONICS' consultant during a 1991 soil-gas survey. As a result of the  
28

1 discovery of contamination at the property, AMERICAN ELECTRONICS engaged in  
2 remediation efforts which culminated with the issuance of two no further action letters, dated  
3 April 19, 1996, and June 20, 1996, from the California Regional Water Quality Control Board,  
4 Santa Ana Region, as well as a no further action letter from the County of Orange Health Care  
5 Agency dated September 26, 1991.

6 **SPECIAL INTERROGATORY NO. 31:**

7 When did YOU learn of detections of SOLVENTS in soil vapor samples at 1600 E.  
8 Valencia Drive, Anaheim, California?

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 31:**

10 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
11 Preliminary Statement and General Objections, which are incorporated by this reference as  
12 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
13 provides the following response: In approximately March 1992, AMERICAN ELECTRONICS  
14 learned that PCE, TCE, 1,1,1-TCA, 1,1-DCE were detected in soil vapor samples taken at  
15 property located at 1600 E. Valencia Drive in Fullerton, California, by its consultant on  
16 December 19 and 20, 1991. Discovery is continuing and AMERICAN ELECTRONICS reserves  
17 the right to supplement its response to this Interrogatory as information becomes available.

18 **SPECIAL INTERROGATORY NO. 32:**

19 To YOUR knowledge, has SOLVENT been detected in any groundwater sample at 1600  
20 E. Valencia Drive, Anaheim, California?

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 32:**

22 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
23 Preliminary Statement and General Objections, which are incorporated by this reference as  
24 though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory on the  
25 grounds that it is vague and ambiguous, insofar as OCWD requests information related to  
26 groundwater samples "at" 1600 E. Valencia Drive in Fullerton, California. Groundwater samples  
27 are collected from the subsurface beneath property. AMERICAN ELECTRONICS objects to this  
28

1 Interrogatory insofar as it implies or assumes that activities at 1600 E. Valencia Drive in  
2 Fullerton, California, have impacted the groundwater beneath the property. Subject to the  
3 foregoing objections, AMERICAN ELECTRONICS provides the following response: TCE was  
4 detected in groundwater samples collected beneath property located at 1600 E. Valencia Drive in  
5 Fullerton, California, by AMERICAN ELECTRONICS in response to the October 26, 1998  
6 request from the California Regional Water Quality Control Board, Santa Ana Region.  
7 Concentrations of DCE and PCE above the maximum contaminant levels for these compounds  
8 were detected in groundwater samples collected beneath the property located at 1600 E. Valencia  
9 Drive in Fullerton, California, during the 1991 Phase II Subsurface Investigation conducted by  
10 Applied Geosciences Inc. on behalf of AMERICAN ELECTRONICS. As a result of the  
11 discovery of PCE and TCE contamination in the soil at and the groundwater beneath the property,  
12 AMERICAN ELECTRONICS engaged in remediation efforts, which culminated in the issuance  
13 of two no further action letters, dated April 19, 1996, and June 20, 1996, from the California  
14 Regional Water Quality Control Board, Santa Ana Region, as well as a no further action letter  
15 from the County of Orange Health Care Agency dated September 26, 1991.

16 **SPECIAL INTERROGATORY NO. 33:**

17 When did YOU learn of detections of SOLVENTS in groundwater at 1600 E. Valencia  
18 Drive, Anaheim, California?

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 33:**

20 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
21 Preliminary Statement and General Objections, which are incorporated by this reference as  
22 though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory on the  
23 grounds that it is vague and ambiguous, and therefore overbroad, insofar as OCWD requests  
24 information related to groundwater samples "at" 1600 E. Valencia Drive in Fullerton, California.  
25 Groundwater samples are collected from the subsurface beneath property. AMERICAN  
26 ELECTRONICS objects to this Interrogatory insofar as it implies or assumes that activities at  
27 1600 E. Valencia Drive in Fullerton, California, have impacted the groundwater beneath the  
28

1 property. Subject to the foregoing objections, AMERICAN ELECTRONICS provides the  
2 following response: In approximately June 1989, AMERICAN ELECTRONICS learned that TCE  
3 was detected in groundwater samples collected beneath property located at 1600 E. Valencia  
4 Drive in Fullerton, California, as a result of the Subsurface Investigation conducted by Ray E.  
5 Lewis Engineering, Inc., a consultant retained by AMERICAN ELECTRONICS in response to an  
6 October 26, 1988 request from the California Regional Water Quality Control Board, Santa Ana  
7 Region. In approximately August 1991, AMERICAN ELECTRONICS learned that  
8 concentrations of PCE and DCE above the maximum contaminant levels for these compounds  
9 were detected in groundwater samples collected beneath the property located at 1600 E. Valencia  
10 Drive in Fullerton, California, during the 1991 Phase II Subsurface Investigation conducted by  
11 Applied Geosciences Inc. on behalf of AMERICAN ELECTRONICS. Discovery is continuing  
12 and AMERICAN ELECTRONICS reserves the right to supplement its response to this  
13 Interrogatory as information becomes available.

14 **SPECIAL INTERROGATORY NO. 34:**

15 Have YOU ever sampled soil at 1600 E. Valencia Drive, Anaheim, California for the  
16 presence SOLVENTS?

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 34:**

18 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
19 Preliminary Statement and General Objections, which are incorporated by this reference as  
20 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
21 provides the following response: Yes, AMERICAN ELECTRONICS has sampled soil at property  
22 located at 1600 E. Valencia Drive in Fullerton, California, for the presence of solvents.

23 **SPECIAL INTERROGATORY NO. 35:**

24 Have YOU ever sampled soil vapor at 1600 E. Valencia Drive, Anaheim, California for  
25 the presence SOLVENTS?

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 35:**

27 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
28

1 Preliminary Statement and General Objections, which are incorporated by this reference as  
2 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
3 provides the following response: Yes, AMERICAN ELECTRONICS has sampled soil vapor at  
4 property located at 1600 E. Valencia Drive in Fullerton, California, for the presence of solvents.

5 **SPECIAL INTERROGATORY NO. 36:**

6 Have YOU ever sampled groundwater at 1600 E. Valencia Drive, Anaheim, California for  
7 the presence SOLVENTS?

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 36:**

9 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
10 Preliminary Statement and General Objections, which are incorporated by this reference as  
11 though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory on the  
12 grounds that it is vague and ambiguous, and therefore overbroad, insofar as OCWD requests  
13 information related to groundwater samples "at" 1600 E. Valencia Drive in Fullerton, California.  
14 Groundwater samples are collected from the subsurface beneath property. AMERICAN  
15 ELECTRONICS objects to this Interrogatory insofar as it implies or assumes that activities at  
16 1600 E. Valencia Drive in Fullerton, California, have impacted the groundwater beneath the  
17 property. Subject to the foregoing objections, AMERICAN ELECTRONICS provides the  
18 following response: Yes, AMERICAN ELECTRONICS has sampled groundwater beneath  
19 property located at 1600 E. Valencia Drive in Fullerton, California, for the presence of solvents.

20 **SPECIAL INTERROGATORY NO. 37:**

21 When did YOU conduct sampling for SOLVENTS at 1600 E. Valencia Drive, Anaheim,  
22 California?

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 37:**

24 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
25 Preliminary Statement and General Objections, which are incorporated by this reference as  
26 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
27 provides the following response: AMERICAN ELECTRONICS began sampling for solvents at  
28

1 property located at 1600 E. Valencia Drive in Fullerton, California, in approximately April 1989,  
2 during a Subsurface Investigation conducted by Ray E. Lewis Engineering, Inc., a consultant  
3 retained by AMERICAN ELECTRONICS in response to an October 26, 1988 request from the  
4 California Regional Water Quality Control Board, Santa Ana Region. AMERICAN  
5 ELECTRONICS continued to periodically sample the soil at and/or groundwater beneath the  
6 property located at 1600 E. Valencia Drive in Fullerton, California, until approximately June 20,  
7 1996, when it received the second of two no further action letters from the Regional Board.  
8 AMERICAN ELECTRONICS monitored the groundwater beneath 1600 E. Valencia Drive in  
9 Fullerton, California, through October 30, 2003, when it received approval from the Regional  
10 Board to decommission its remaining groundwater monitoring wells.

11 **SPECIAL INTERROGATORY NO. 38:**

12 Why did YOU sample for SOLVENTS at 1600 E. Valencia Drive, Anaheim, California?

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 38:**

14 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
15 Preliminary Statement and General Objections, which are incorporated by this reference as  
16 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
17 provides the following response: AMERICAN ELECTRONICS initially began sampling for the  
18 presence of solvents at property located at 1600 E. Valencia Drive in Fullerton, California, in  
19 response to the October 26, 1998 request from the California Regional Water Quality Control  
20 Board, Santa Ana Region, (the "Regional Board") that AMERICAN ELECTRONICS conduct a  
21 subsurface investigation at property located at 1600 E. Valencia Drive in Fullerton, California, in  
22 order to assess the extent of the groundwater contamination discovered by the Regional Board in  
23 the Fullerton/Anaheim area in 1987.

24 **SPECIAL INTERROGATORY NO. 39:**

25 Describe the action YOU took upon learning that SOLVENTS were detected at 1600 E.  
26 Valencia Drive, Anaheim, California?

27 ///

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 39:**

2 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
3 Preliminary Statement and General Objections, which are incorporated by this reference as  
4 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
5 provides the following response: In 1987, the California Water Quality Control Board, Santa Ana  
6 Region, (the "Regional Board") notified AMERICAN ELECTRONICS that sampling results  
7 from wells in the Fullerton/Anaheim area revealed the presence of organic contaminants in the  
8 groundwater. Subsequently, the Regional Board requested that AMERICAN ELECTRONICS  
9 fill out a questionnaire regarding its operations history at property located at 1600 E. Valencia  
10 Drive in Fullerton, California, (the "Property"), which AMERICAN ELECTRONICS completed  
11 and returned on April 8, 1987. On October 26, 1988, the Regional Board requested that  
12 AMERICAN ELECTRONICS conduct a subsurface investigation of the Property in order to aid  
13 the Regional Board in determining potential sources of groundwater contamination in the area.  
14 As a result, in November 1988, AMERICAN ELECTRONICS retained Ray E. Lewis Consulting  
15 Engineers, Inc. ("REL") to voluntarily provide the Regional Board with the requested  
16 information.

17 On December 13, 1988, REL submitted a work plan for its subsurface investigation of the  
18 Property. In February 1989, after the Regional Board provided comments to REL's proposed  
19 work plan, REL began implementing the work plan to assess the presence of volatile organic  
20 compounds ("VOCs") in the soil and groundwater in and beneath the Property. REL's subsurface  
21 investigation involved the drilling, installation, and sampling of three groundwater monitoring  
22 wells known as BP-1, BP-2, and BP-3 between March 22, 1989 and April 5, 1989. The soil and  
23 groundwater sampling conducted during this period revealed the presence of PCE and TCE in the  
24 soil and TCE in the groundwater.

25 In February 1990, REL presented a Plan of Action to the Regional Board. On June 11,  
26 1990, in response to Regional Board comments, REL submitted a Revised Plan of Action. On  
27 August 16, 1990, AMERICAN ELECTRONICS submitted the results of REL's August 8, 1990  
28



1 sampling of BP-1, BP-2, and BP-3 and agreed to install three additional monitoring wells, BP-4,  
2 BP-5, and BP-6.

3 In approximately December 1990, AMERICAN ELECTRONICS retained Applied  
4 Geosciences, Inc. ("AGI") to continue the investigatory work previously conducted by REL. On  
5 December 10, 1990, AGI submitted a Proposed Subsurface Investigation to the Regional Board,  
6 modifying the previous scope of work conducted by REL. AGI's Subsurface Investigation  
7 involved the drilling of monitoring wells BP-4, BP-5, and BP-6, as well as three soil borings, SB-  
8 1, SB-2, and SB-3. The results of AGI's Subsurface Investigation were presented to the Regional  
9 Board in an August 30, 1991 report.

10 On September 26, 1991, AMERICAN ELECTRONICS received a letter from the County  
11 of Orange Health Care Agency regarding Industrial Cleanup and Remedial Action and Referral to  
12 the Regional Board stating that American Electronics had completed its "site assessment and  
13 remedial action in regards to soil contamination . . . ."

14 In response to the Regional Board's suggestion that AMERICAN ELECTRONICS further  
15 investigate the lateral and vertical extent of the contamination at the Property, on November 14,  
16 1991, AGI proposed conducting a soil-gas survey and advancing soil borings at the Property. On  
17 December 20, 1991, the Regional Board approved AGI's plan. On December 19 and 20, 1991,  
18 AGI conducted a soil-gas survey. Based on the results of the soil-gas survey, AGI advanced four  
19 (4) soil borings to depths of approximately 20 feet BGS.

20 On April 14, 1994, AGI submitted a vapor extraction system proposal to the Regional  
21 Board. The Regional Board approved AGI's proposal on May 23, 1994. Between June and  
22 October 1994, AGI assembled and installed the vapor extraction system on the Property. Vapor  
23 extraction system startup and initial operations occurred between October 13 and November 15,  
24 1994. During this time period, AGI operated the vapor extraction system on a 24-hour-per-day  
25 basis, with minor exceptions. AGI monitored the system on a daily basis for the first two weeks  
26 of operation and once a week for the remaining two weeks of the startup period. AGI continued  
27 to operate the vapor extraction system until January 31, 1995, which concluded the first quarter of  
28

1 the vapor extraction system's operations. AGI's first quarter progress report evidenced a 98  
2 percent reduction in VOC concentration in the extracted vapors and confirmed that remediation  
3 efforts were proceeding ahead of schedule. As a result, AGI shut down the vapor extraction  
4 system for two (2) weeks in order to "pulse" the system.

5 On April 4, 1995, AGI conducted additional sampling of the vapor extraction system,  
6 which confirmed that the vapor extraction system had reduced the VOC concentration in the soil  
7 by 98 percent. Subsequently, on May 15, 1995, AGI submitted a proposal to the Regional Board  
8 to conduct a subsurface investigation to document the completion of the remedial efforts at the  
9 Property and closure of the vapor extraction system. The Regional Board approved AGI's  
10 proposal on July 5, 1995. On July 18, 1995, AGI commenced its subsurface investigation by  
11 advancing three (3) soil borings known as CB-1, CB-2, and CB-3 on the Property. CB-1 and CB-  
12 3 were advanced to approximately 15 feet BGS and CB-2 was advanced to 13 feet BGS. The  
13 sampling results evidenced a 97 percent reduction in VOC concentrations in the soil, leading AGI  
14 to conclude that remediation of the soil was complete. AGI's closure report was transmitted to  
15 the Regional Board on August 31, 1995.

16 On April 19, 1996, the Regional Board issued a no further action letter to AMERICAN  
17 ELECTRONICS regarding the remediation of the soil at the Property, stating that "[b]ased on the  
18 low concentrations of volatile organic compounds that are present in the soil and the source  
19 removal action conducted, we are not requiring additional investigation or remediation of the  
20 soil." On June 20, 1996, the Regional Board issued a no further action letter to AMERICAN  
21 ELECTRONICS regarding the investigation of the groundwater beneath the Property, stating that  
22 "[b]ased on the concentrations that are present in the groundwater and the source removal action  
23 conducted, we are not requiring additional investigation or site specific remediation of  
24 groundwater." Moreover, the Regional Board acknowledged that "groundwater containing VOCs  
25 is also flowing beneath the site from an off-site source(s)." As a result, the Regional Board  
26 approved AMERICAN ELECTRONICS' removal of all monitoring equipment except for  
27 monitoring wells BP-2, BP-3, BP-4, and BP-8, which AMERICAN ELECTRONICS continued to  
28

1 monitor on an annual basis.

2 Based on the results of AMERICAN ELECTRONICS' continued sampling of monitoring  
3 wells BP-2, BP-3, BP-4, and BP-8, AMERICAN ELECTRONICS' consultant, ATC Associates,  
4 Inc. ("ATC"), concluded in 1998 that "the concentrations of chlorinated hydrocarbons detected  
5 in samples collected from the monitoring wells are consistent with the background concentrations  
6 in the region and do not support the theory that the site operations have impacted the underlying  
7 aquifer." As a result, on January 8, 1998, ATC requested the Regional Board's approval to  
8 conclude the monitoring program and abandon the remaining monitoring wells on the Property.  
9 On October 30, 2003, the Regional Board approved decommissioning of groundwater monitoring  
10 wells BP-2, BP-3, BP-4, and BP-8.

11 **SPECIAL INTERROGATORY NO. 40:**

12 IDENTIFY each PERSON with knowledge regarding YOUR response to the detection of  
13 SOLVENTS at 1600 E. Valencia Drive, Anaheim, California?

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 40:**

15 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
16 Preliminary Statement and General Objections, which are incorporated by this reference as  
17 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
18 provides the following response: AMERICAN ELECTRONICS' response to the detection of  
19 solvents at 1600 E. Valencia Drive in Fullerton, California, began nearly 20 years ago.  
20 Individuals who authored the various work plans, submittals, and other reports concerning the  
21 investigation and remediation are the individuals most likely to have information regarding  
22 AMERICAN ELECTRONICS' response to the detection of solvents at 1600 E. Valencia Drive in  
23 Fullerton, California.

24 **SPECIAL INTERROGATORY NO. 41:**

25 IDENTIFY all PERSONS with knowledge regarding the RELEASE of SOLVENTS at  
26 1600 E. Valencia Drive, Anaheim, California. (PERSON includes a natural person, firm,  
27 association, organization, partnership, business, trust, corporation, or public entity. When used  
28

1 with respect to an entity that is not an individual, the word "IDENTIFY" means to state the name  
2 of the entity and its present or last known business address. When used with respect to a  
3 PERSON who is an individual, the word "IDENTIFY" means to state the name, present or last  
4 known phone number, present or last known business address, present or last known employer,  
5 and the present or last known position held with such employer.)

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 41:**

7 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
8 Preliminary Statement and General Objections, which are incorporated by this reference as  
9 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
10 provides the following response: AMERICAN ELECTRONICS is presently unaware of persons  
11 with knowledge of releases of solvents at property located at 1600 E. Valencia Drive in Fullerton,  
12 California. Discovery is continuing and AMERICAN ELECTRONICS reserves the right to  
13 supplement its response to this Interrogatory as information becomes available.

14 **SPECIAL INTERROGATORY NO. 42:**

15 IDENTIFY each consultant you retained to investigate contamination at 1600 E. Valencia  
16 Drive, Anaheim, California.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 42:**

18 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
19 Preliminary Statement and General Objections, which are incorporated by this reference as  
20 though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory on the  
21 grounds that it is vague and ambiguous, and therefore overbroad, insofar as OCWD fails to define  
22 the terms "retained," "investigate," and "contamination." Subject to the foregoing objections,  
23 AMERICAN ELECTRONICS provides the following response: AMERICAN ELECTRONICS  
24 retained the following consultants to investigate the contamination at property located at 1600 E.  
25 Valencia Drive in Fullerton, California:

- 26 • Ray E. Lewis Consulting Engineers, Inc., 459 Holly Street, Laguna Beach, CA;  
27 telephone no. 714.497.1580.

- Applied Geosciences, Inc., 17321 Irvine Blvd., Tustin, CA 92680; telephone no. 714.734.0303.
- Cousineau, Lundblad & Associates, Inc., 1528 Via Tulipan, San Clemente, CA 92673; telephone no. 714.361.3902.
- ATC Environmental Inc., 7321 Irvine Blvd., 17321 Irvine Blvd., Tustin, CA 92680; telephone no. 714.734.0303.

**SPECIAL INTERROGATORY NO. 43:**

IDENTIFY each consultant you retained to remediate contamination at 1600 E. Valencia Drive, Anaheim, California.

**RESPONSE TO SPECIAL INTERROGATORY NO. 43:**

AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the Preliminary Statement and General Objections, which are incorporated by this reference as though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory on the grounds that it is vague and ambiguous, and therefore overbroad, insofar as OCWD fails to define the terms "retained," "remediate," and "contamination." Subject to the foregoing objections, AMERICAN ELECTRONICS provides the following response: AMERICAN ELECTRONICS retained the following consultants to investigate the contamination at property located at 1600 E. Valencia Drive in Fullerton, California:

- Ray E. Lewis Consulting Engineers, Inc., 459 Holly Street, Laguna Beach, CA; telephone no. 714.497.1580.
- Applied Geosciences, Inc., 17321 Irvine Blvd., Tustin, CA 92680; telephone no. 714.734.0303.
- Cousineau, Lundblad & Associates, Inc., 1528 Via Tulipan, San Clemente, CA 92673; telephone no. 714.361.3902.
- ATC Environmental Inc., 7321 Irvine Blvd., 17321 Irvine Blvd., Tustin, CA 92680; telephone no. 714.734.0303.

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1 **SPECIAL INTERROGATORY NO. 44:**

2 If remediation at 1600 E. Valencia Drive, Anaheim, California is not currently active,  
3 when did active remediation cease?

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 44:**

5 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
6 Preliminary Statement and General Objections, which are incorporated by this reference as  
7 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
8 provides the following response: AMERICAN ELECTRONICS completed its remediation of the  
9 soil at 1600 E. Valencia Drive in Fullerton, California, in approximately April 1996. On April  
10 19, 1996, the California Regional Water Quality Control Board, Santa Ana Region, (the  
11 "Regional Board") issued a no further action letter confirming "the completion of site  
12 investigation and remedial action for soil at the site" and stating that no additional investigation or  
13 remediation of the soil was required. AMERICAN ELECTRONICS completed its investigation  
14 of the groundwater beneath 1600 E. Valencia Drive in Fullerton, California, in approximately  
15 June 1996. On June 20, 1996, the Regional Board issued another no further action letter stating  
16 that it was "not requiring additional investigation or site specific remediation of groundwater."  
17 Based on this letter from the Regional Board, AMERICAN ELECTRONICS removed all  
18 monitoring equipment from 1900 E. Valencia Drive in Fullerton, California, except for  
19 monitoring wells BP-3, BP-3, BP-4, and BP-8, which AMERICAN ELECTRONICS continued to  
20 monitor. Monitoring wells BP-3, BP-3, BP-4, and BP-8 were properly abandoned after  
21 AMERICAN ELECTRONICS received an October 30, 2003 letter from the Regional Board  
22 authorizing the decommissioning of these monitoring wells.

23 **SPECIAL INTERROGATORY NO. 45:**

24 IDENTIFY each PERSON who RELEASED SOLVENTS at 1600 E. Valencia Drive,  
25 Anaheim, California.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 45:**

27 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
28

1 Preliminary Statement and General Objections, which are incorporated by this reference as  
2 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
3 provides the following response: AMERICAN ELECTRONICS is presently unaware of any  
4 person who released solvents at property located at 1600 E. Valencia Drive in Fullerton,  
5 California. Discovery is continuing and AMERICAN ELECTRONICS reserves the right to  
6 supplement its response to this Interrogatory as information becomes available.

7 **SPECIAL INTERROGATORY NO. 46:**

8 IDENTIFY each PERSON who RELEASED chemical waste at 1600 E. Valencia Drive,  
9 Anaheim, California.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 46:**

11 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
12 Preliminary Statement and General Objections, which are incorporated by this reference as  
13 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
14 provides the following response: AMERICAN ELECTRONICS is presently unaware of any  
15 person who released chemical waste at property located at 1600 E. Valencia Drive in Fullerton,  
16 California. Discovery is continuing and AMERICAN ELECTRONICS reserves the right to  
17 supplement its response to this Interrogatory as information becomes available.

18 **SPECIAL INTERROGATORY NO. 47:**

19 If YOU contend that any PERSON other than AMERICAN ELECTRONICS is  
20 responsible for the SOLVENT contamination found at 1600 E. Valencia Drive, Anaheim,  
21 California, state all facts on which YOU base that contention.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 47:**

23 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
24 Preliminary Statement and General Objections, which are incorporated by this reference as  
25 though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory on the  
26 grounds that it is vague and ambiguous insofar as a result of OCWD's use of the term "at."  
27 Groundwater containing TCE was found beneath the property. Subject to the foregoing  
28

1 objections, AMERICAN ELECTRONICS provides the following response: Groundwater  
2 monitoring wells on the upgradient boundary of 1600 E. Valencia Drive in Fullerton, California,  
3 consistently indicated that groundwater contamination was migrating beneath the property from  
4 off-site sources. Discovery is continuing and AMERICAN ELECTRONICS reserves the right to  
5 supplement its response to this Interrogatory as information becomes available.

6 **SPECIAL INTERROGATORY NO. 48:**

7 If YOU contend that any PERSON other than American Electronics is responsible for the  
8 SOLVENT contamination found at 1600 E. Valencia Drive, Anaheim, California, IDENTIFY all  
9 witnesses who have knowledge of such facts.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 48:**

11 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
12 Preliminary Statement and General Objections, which are incorporated by this reference as  
13 though fully set forth herein. AMERICAN ELECTRONICS objects to this Interrogatory on the  
14 grounds that it is vague and ambiguous insofar as a result of OCWD's use of the term "at."  
15 Groundwater containing TCE was found beneath the property. Subject to the foregoing  
16 objections, AMERICAN ELECTRONICS provides the following response: Groundwater  
17 monitoring wells on the upgradient boundary of 1600 E. Valencia Drive in Fullerton, California,  
18 consistently indicated that groundwater contamination was migrating beneath the property from  
19 off-site sources. Discovery is continuing and AMERICAN ELECTRONICS reserves the right to  
20 supplement its response to this Interrogatory as information becomes available.

21 **SPECIAL INTERROGATORY NO. 49:**

22 If YOU contend that any PERSON other than American Electronics is responsible for the  
23 SOLVENT contamination found at 1600 E. Valencia Drive, Anaheim, California, IDENTIFY all  
24 DOCUMENTS supporting this contention. (When used with respect to a DOCUMENT the word  
25 "IDENTIFY" means to state the date the DOCUMENT bears, the title of the DOCUMENT, if  
26 any, and the IDENTITY of the author or authors of the DOCUMENT. "DOCUMENT(S)" means  
27 all writings as defined by Evidence Code Section 250, as well as any recorded, magnetic or  
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1 electronic matter of any kind whatsoever (including, without limitation, electronic, audio and/or  
2 video recordings and material for computer use), however produced or reproduced, coded or  
3 stored.)

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 49:**

5 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
6 Preliminary Statement and General Objections, which are incorporated by this reference as  
7 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
8 provides the following response: Documents containing groundwater monitoring data submitted  
9 to the Regional Water Quality Control Board, Santa Ana Region, by various parties including  
10 AMERICAN ELECTRONICS. Discovery is continuing and AMERICAN ELECTRONICS  
11 reserves the right to supplement its response to this Interrogatory as information becomes  
12 available.

13 **SPECIAL INTERROGATORY NO. 50:**

14 IDENTIFY the PERSON(S) who have the most knowledgeable regarding the RELEASE  
15 of SOLVENTS at 1600 E. Valencia Drive, Anaheim, California.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 50:**

17 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
18 Preliminary Statement and General Objections, which are incorporated by this reference as  
19 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
20 provides the following response: Please refer to AMERICAN ELECTRONICS' response to  
21 Interrogatory No. 39. Discovery is continuing and AMERICAN ELECTRONICS reserves the  
22 right to supplement its response to this Interrogatory as information becomes available.

23 **SPECIAL INTERROGATORY NO. 51:**

24 IDENTIFY each PERSON who recommended that soil samples from 1600 E. Valencia  
25 Drive, Anaheim, California should be tested for SOLVENTS.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 51:**

27 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
28

1 Preliminary Statement and General Objections, which are incorporated by this reference as  
2 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
3 provides the following response: Please refer to AMERICAN ELECTRONICS' response to  
4 Interrogatory No. 39. Discovery is continuing and AMERICAN ELECTRONICS reserves the  
5 right to supplement its response to this Interrogatory as information becomes available.

6 **SPECIAL INTERROGATORY NO. 52:**

7 IDENTIFY each PERSON who recommended that soil vapor samples from 1600 E.  
8 Valencia Drive, Anaheim, California should be tested for SOLVENTS.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 52:**

10 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
11 Preliminary Statement and General Objections, which are incorporated by this reference as  
12 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
13 provides the following response: Please refer to AMERICAN ELECTRONICS' response to  
14 Interrogatory No. 39. Discovery is continuing and AMERICAN ELECTRONICS reserves the  
15 right to supplement its response to this Interrogatory as information becomes available.

16 **SPECIAL INTERROGATORY NO. 53:**

17 IDENTIFY each PERSON who recommended that groundwater samples from 1600 E.  
18 Valencia Drive, Anaheim, California should be tested for SOLVENTS.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 53:**

20 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
21 Preliminary Statement and General Objections, which are incorporated by this reference as  
22 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
23 provides the following response: Please refer to AMERICAN ELECTRONICS' response to  
24 Interrogatory No. 39. Discovery is continuing and AMERICAN ELECTRONICS reserves the  
25 right to supplement its response to this Interrogatory as information becomes available.

26 **SPECIAL INTERROGATORY NO. 54:**

27 IDENTIFY each PERSON YOU employed who worked at 1600 E. Valencia Drive,  
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1 Anaheim, California. (You may limit your response to persons who worked with SOLVENTS if  
2 that information is available.)

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 54:**

4 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
5 Preliminary Statement and General Objections, which are incorporated by this reference as  
6 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
7 provides the following response: AMERICAN ELECTRONICS is no longer in possession of  
8 employee records or an employee roster that identifies persons it employed who worked at 1600  
9 E. Valencia Drive in Fullerton, California. AMERICAN ELECTRONICS also is no longer in  
10 possession or employee records or an employee roster that identifies persons it employed who  
11 worked with solvents at 1600 E. Valencia Drive in Fullerton, California.

12 **SPECIAL INTERROGATORY NO. 55:**

13 IDENTIFY the PERSON(S) most knowledgeable concerning the use of SOLVENTS at  
14 1600 E. Valencia Drive, Anaheim, California.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 55:**

16 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
17 Preliminary Statement and General Objections, which are incorporated by this reference as  
18 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
19 provides the following response: AMERICAN ELECTRONICS is presently unaware of any  
20 persons with knowledge concerning the use of solvents at property located at 1600 E. Valencia  
21 Drive in Fullerton, California. Discovery is continuing and AMERICAN ELECTRONICS  
22 reserves the right to supplement its response to this Interrogatory as information becomes  
23 available.

24 **SPECIAL INTERROGATORY NO. 56:**

25 IDENTIFY the PERSON(S) most knowledgeable concerning storage of SOLVENTS at  
26 1600 E. Valencia Drive, Anaheim, California.

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 56:**

2 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
3 Preliminary Statement and General Objections, which are incorporated by this reference as  
4 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
5 provides the following response: AMERICAN ELECTRONICS is presently unaware of persons  
6 with knowledge concerning the storage of solvents at property located at 1600 E. Valencia Drive  
7 in Fullerton, California. Discovery is continuing and AMERICAN ELECTRONICS reserves the  
8 right to supplement its response to this Interrogatory as information becomes available.

9 **SPECIAL INTERROGATORY NO. 57:**

10 IDENTIFY the PERSON(S) most knowledgeable concerning handling of SOLVENTS at  
11 1600 E. Valencia Drive, Anaheim, California.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 57:**

13 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
14 Preliminary Statement and General Objections, which are incorporated by this reference as  
15 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
16 provides the following response: AMERICAN ELECTRONICS is presently unaware of persons  
17 with knowledge concerning the handling of solvents at property located at 1600 E. Valencia  
18 Drive in Fullerton, California. Discovery is continuing and AMERICAN ELECTRONICS  
19 reserves the right to supplement its response to this Interrogatory as information becomes  
20 available.

21 **SPECIAL INTERROGATORY NO. 58:**

22 IDENTIFY the PERSON(S) most knowledgeable concerning the storage of SOLVENT  
23 waste at 1600 E. Valencia Drive, Anaheim, California.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 58:**

25 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
26 Preliminary Statement and General Objections, which are incorporated by this reference as  
27 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
28

1 provides the following response: AMERICAN ELECTRONICS is presently unaware of persons  
2 with knowledge concerning the storage of solvent waste at property located at 1600 E. Valencia  
3 Drive in Fullerton, California. Discovery is continuing and AMERICAN ELECTRONICS  
4 reserves the right to supplement its response to this Interrogatory as information becomes  
5 available.

6 **SPECIAL INTERROGATORY NO. 59**  
7 **(Incorrectly numbered as Special Interrogatory No. 49):**

8 IDENTIFY the PERSON(S) most knowledgeable concerning the storage of chemical  
9 waste at 1600 E. Valencia Drive, Anaheim, California.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 59:**

11 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
12 Preliminary Statement and General Objections, which are incorporated by this reference as  
13 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
14 provides the following response: AMERICAN ELECTRONICS is presently unaware of any  
15 persons with knowledge concerning the storage of chemical waste at property located at 1600 E.  
16 Valencia Drive in Fullerton, California. Discovery is continuing and AMERICAN  
17 ELECTRONICS reserves the right to supplement its response to this Interrogatory as information  
18 becomes available.

19 **SPECIAL INTERROGATORY NO. 60**  
20 **(Incorrectly numbered as Special Interrogatory No. 50):**

21 IDENTIFY the PERSON(S) most knowledgeable concerning the disposal of SOLVENTS  
22 at 1600 E. Valencia Drive, Anaheim, California.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 60:**

24 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
25 Preliminary Statement and General Objections, which are incorporated by this reference as  
26 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
27 provides the following response: AMERICAN ELECTRONICS did not dispose of solvents at  
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1 property located at 1600 E. Valencia Drive in Fullerton, California.

2 **SPECIAL INTERROGATORY NO. 61**  
3 **(Incorrectly numbered as Special Interrogatory No. 51):**

4 IDENTIFY the PERSON(S) most knowledgeable concerning the disposal of SOLVENT  
5 waste at 1600 E. Valencia Drive, Anaheim, California.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 61:**

7 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
8 Preliminary Statement and General Objections, which are incorporated by this reference as  
9 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
10 provides the following response: AMERICAN ELECTRONICS did not dispose of solvent waste  
11 at property located at 1600 E. Valencia Drive in Fullerton, California.

12 **SPECIAL INTERROGATORY NO. 62**  
13 **(Incorrectly numbered as Special Interrogatory No. 52):**

14 Do YOU have any indemnity rights against the Department of Defense relating to this  
15 action?

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 62:**

17 AMERICAN ELECTRONICS objects to this Interrogatory for the reasons set forth in the  
18 Preliminary Statement and General Objections, which are incorporated by this reference as  
19 though fully set forth herein. Subject to the foregoing objections, AMERICAN ELECTRONICS  
20 provides the following response: AMERICAN ELECTRONICS is presently unaware of whether  
21 it has any indemnity rights against the Department of Defense relating to this action. Discovery is

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1 continuing and AMERICAN ELECTRONICS reserves the right to supplement its response to  
2 this Interrogatory as information becomes available.

3  
4 DATED: November 20, 2006

DOWNEY BRAND LLP

5  
6 By:



7 CLIFTON J. McFARLAND  
8 Attorneys for Defendants  
9 AMERICAN ELECTRONICS, INC.  
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